

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

IN RE: GERBER PRODUCTS COMPANY  
HEAVY METALS BABY FOOD  
LITIGATION

Master File No. 1:21-cv-00269 (MSN/JFA)

This Document Relates to ALL Cases

**GERBER PRODUCTS COMPANY’S MOTION TO COMPEL PLAINTIFFS’ ANSWERS  
TO INTERROGATORIES AND PRODUCTION OF DOCUMENTS**

COMES NOW Defendant Gerber Products Company, pursuant to Rule 37(a) of the Federal Rules of Civil Procedure, Local Rules 7 and 37, and the Court’s Scheduling Order (ECF No. 131), and moves this Court to compel Plaintiffs to provide complete answers to Gerber’s Interrogatory Numbers 2, 3, 4, 6, 7, 8, 9, 10, 14, and 17, and produce documents in response to Gerber’s Request for Production Number 7. Gerber also respectfully requests that the Court overrule Plaintiffs’ objections upon which they are not standing for Interrogatory Nos. 1, 5, 11, 12, 13, 15, 16, 17, 18, 19, and 20, and Request for Production Numbers 2-4, 7, 8, 10-13, and 16.

Pursuant to Local Rules 7(E) and 37(E), and the Court’s Scheduling Order (ECF No. 131), counsel for the parties have met and conferred in an effort to resolve the issues raised in this Motion, but were unable to do so. A memorandum of facts and law supporting this motion is filed herewith, along with a proposed order.

WHEREFORE, for the reasons stated in the Memorandum in support of this motion submitted herewith, its supporting exhibits, for reasons to be stated in oral argument, and any other cause deemed appropriate by this Court, Gerber respectfully requests that its Motion to Compel Plaintiffs’ discovery responses be granted.

Dated: August 12, 2022

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 12, 2022, I caused a copy of the foregoing **MOTION TO COMPEL DEFENDANTS' RESPONSES TO REQUESTS FOR PRODUCTION AND ANSWERS TO INTERROGATORIES** to be filed electronically with the Clerk of the Court via the Court's ECF system, which will send notification of such filing to all counsel of record.

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